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Attorneys for Defendants

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSÉ DIVISION**

PAJARO VALLEY UNIFIED SCHOOL
DISTRICT,

Plaintiff,

vs.

J.S., A.O., and DOES 1-10, inclusive,

Defendants.

) Case No. C06-00380 PVT

) **JOINT STIPULATION TO ENLARGE**
) **TIME FOR FILING MOTION FOR**
) **ATTORNEYS' FEES; ~~DECLARATION IN~~**
) **~~SUPPORT~~; AND ~~PROPOSED~~ ORDER**

1 Defendants, J.S. and A.O., and plaintiff, Pajaro Valley Unified School District, by and
2 through their respective counsel of record, hereby stipulate as follows:

3 1. On December 15, 2006, the Court granted defendants' motion for summary judgment
4 and denied plaintiff's motion for same. Under L.R. 54-6, defendants' motion for an award of
5 attorneys' fees must be filed within 14 days of entry of judgment.

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7 2. Defendants' counsel, Protection and Advocacy, Inc. and the Law Office of Eileen
8 Matteucci, intend to seek an award of attorneys' fees.

9 3. The parties intend to meet and confer in an effort to informally resolve the matter and
10 thereby alleviate the need for filing a motion.

11 4. As defendants' counsel require more time to prepare their fees demand and engage in
12 written and/or oral exchanges with plaintiff, the parties are concerned that the time may exceed
13 what is permitted under the local rules, particularly at the year-end close of business for the
14 holidays.
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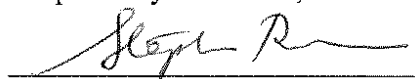
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1 5. Should the parties fail to resolve the matter informally, the parties agree that defendants'
2 motion would be filed no later than February 15, 2007.
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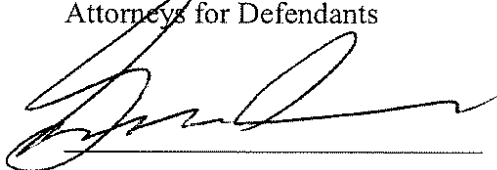
4 Dated: December 22, 2006
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Respectfully submitted,



Stephen A. Rosenbaum
PROTECTION AND ADVOCACY, INC.

Eileen Matteucci
LAW OFFICE OF EILEEN MATTEUCCI
Attorneys for Defendants




Gregory A. Wedner
LOZANO SMITH
Attorneys for Plaintiff

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11 Dated: December 22, 2006
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15 Pursuant to stipulation, IS IT SO ORDERED.
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17 Dated: 1/2, 2007
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Hon. Patricia v. Trumbull
UNITED STATES MAGISTRATE JUDGE